

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

-----X  
CROWN CLOTHING CORPORATION, : Civil Action No. 05-10049 (NG)  
Plaintiff :  
v. :  
RANDCORE, INC., :  
RAND INTERNATIONAL TRADING, :  
INC., ANDRE BERNARD, AND :  
RONALD BERNARD, :  
Defendants :  
-----X

**MOTION OF DEFENDANTS' COUNSEL TO FURTHER CONTINUE HEARING  
ON MOTION TO WITHDRAW**

Now comes the undersigned, counsel for the defendants Andre Bernard, Rand International Trading, Inc. and Randcore, Inc., and moves for a brief further continuance in the hearing on his motion to withdraw. In support of this motion, the undersigned states:

1. The undersigned counsel has been conferring with counsel for the plaintiff as to language for a proposed agreement for judgment and related documents.
2. Counsel are hopeful that a final agreement can be worked out within the next few days.
3. If those discussions are successful the opposition of Crown Clothing to the motion to withdraw will be withdrawn, thus precluding the need to have any hearing.

WHEREFORE, undersigned counsel moves to continue the hearing on the motion to withdraw until the afternoon of Friday, January 6, or thereafter.

Respectfully submitted,

/s/ Jeffrey S. Stern

Jeffrey S. Stern, (BBO No. 479460)  
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Assented to:

/s/ John C. Wyman

John C. Wyman, Esquire  
Ryan MacDonald, Esquire  
Murtha Cullina LLP  
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DATED: January 3, 2006

CERTIFICATE OF SERVICE

I, Jeffrey S. Stern, hereby certify that on the above date I served the within document by faxing and mailing a copy of same, postage prepaid, to the following counsel of record:

John C. Wyman, Esquire  
Ryan MacDonald, Esquire  
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/s/ Jeffrey S. Stern

Jeffrey S. Stern

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